

1 **CHRISTENSEN JAMES & MARTIN**
2 KEVIN B. CHRISTENSEN, ESQ. (175)
3 DARYL E. MARTIN, ESQ. (6735)
4 LAURA J. WOLFF, ESQ. (6869)
5 7440 W. Sahara Avenue
6 Las Vegas, Nevada 89117
7 Tel.: (702) 255-1718
8 Fax: (702) 255-0871
9 kbc@cjmlv.com, dem@cjmlv.com, ljw@cjmlv.com
10 *Attorneys for Plaintiff*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 * * * * *

14 UNITE HERE HEALTH, by and through its
15 fiduciary, Matthew Walker,

16 Plaintiff,
17 vs.

18 DESERT PALACE, INC. dba CAESAR'S
19 PALACE, a Nevada corporation; BISTRO
20 CENTRAL, LV, LLC dba CENTRAL 24/7, a
Nevada limited liability company; CARL
HALVORSON, individually; JOHN DOES I-X,
inclusive, ROE ENTITIES I-X, inclusive,

21 Defendants.

22 CASE: 2:13-cv-00069-GMN-PAL

23 [Proposed]
**ORDER SCHEDULING
JUDGMENT DEBTOR
EXAMINATION AND ORDER
FOR PRODUCTION OF
DOCUMENTS**

24 Date:

25 Time:

26 Pursuant to the Application of the Judgment Creditor for issuance of this Court's Order
27 Scheduling Judgment Debtor Examination and Production of Documents, Good Cause
Appearing therefor,

28 IT IS HEREBY ORDERED, ADJUDGED and DECREED that:

1. Defendant / Judgment Debtor BISTRO CENTRAL, LV, LLC shall designate its
owner Carl Halvorson, or other person(s) knowledgeable of its assets and of the matters
identified below, who shall personally appear before this Court on Lcpwct{'9."4236,
"cv'; <22"com. and shall be sworn to tell the truth and give testimony at a
subsequent Judgment Debtor Examination.

1 2. Subject to such other arrangements as the parties may later agree regarding date
2 or time, the person(s) so designated, immediately after appearing before this Court on the date
3 and time above stated, shall accompany Judgment Creditor's Counsel and shall give sworn
4 testimony at a Judgment Debtor Examination to be held the offices of Counsel for the Judgment
5 Creditor, Christensen James & Martin, located at 7440 W. Sahara Avenue, Las Vegas, NV
6 89117. Judgment Debtors shall be examined with regard to the following:
7

- 8 ▪ The creation, operation and administration of the Judgment Debtor and
9 potentially related and/or successor entities (if any such entities exist);
10 ▪ Life insurance policies owned by the Judgment Debtor and potentially related
11 and/or successor entities;
12 ▪ Assets, finances, banking and escrow accounts of the Judgment Debtor and all
13 related or successor entities;
14 ▪ The names of current directors, members, shareholders, or other entity
15 officers;
16 ▪ Accounts with any financial institutions;
17 ▪ Safety deposit box locations;
18 ▪ Liens or other judgments existing against the Judgment Debtor;
19 ▪ Accounts receivable;
20 ▪ Money owed to the Judgment Debtor by third-parties;
21 ▪ Sources of income available to the Judgment Debtor;
22 ▪ Loans made by the Judgment Debtor;
23 ▪ Loans presently sought by the Judgment Debtor;
24 ▪ Real estate owned by the Judgment Debtor;
25 ▪ Trusts of which the Judgment Debtor may be a beneficiary;
26 ▪ Vehicles or other assets owned by the Judgment Debtor;
27 ▪ Lawsuits or claims asserted by the Judgment Debtor against others;
28 ▪ Equipment, vehicles or other assets loaned by the Judgment Debtor to others;
 ▪ Stocks, bonds, money markets or other investment accounts;
 ▪ Tax liens against the Judgment Debtors;
 ▪ Pending lawsuits against the Judgment Debtors;

1

- Threatened lawsuits against the Judgment Debtors, and
- All other matters relevant to the Judgment Debtor's ability and willingness to pay the Judgment entered by the Court on July 11, 2013.

2

3

4

5

6

7

3. At least one week prior to the above-scheduled Judgment Debtor Examination, Judgment Debtor shall produce the following documents to Christensen James & Martin, c/o Daryl E. Martin, Esq., 7440 W. Sahara Avenue, Las Vegas, Nevada 89117:

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

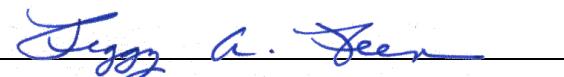
- All documents, electronic data and information related to the creation, operation and administration of the Judgment Debtor and related or successor entities (if any);
- All documents, electronic data and information relating to life insurance policies owned by the Judgment Debtor and related or successor entities;
- All documents, electronic data and information relating to the assets, finances, banking and escrow accounts of the Judgment Debtor and all related or successor entities;
- All documents, electronic data and information relating to any trust of which the Judgment Debtor is a beneficiary;
- Federal and state income tax returns for the past three (3) calendar years;
- Records of Judgment Debtor's checking accounts for calendar year 2013;
- Records of Judgment Debtor's savings accounts for calendar year 2013 ;
- Title or other evidence of ownership of real estate in which Judgment Debtor possesses any interest, including any contingent or unperfected interests;
- Documents regarding any equitable or beneficial ownership of any real estate;
- Titles or other evidence of ownership of automobiles, trucks, vans, campers, motorcycles, snowmobiles or other motor vehicles of any type or description;
- Titles or other evidence of ownership for equipment, machinery, tools and the like;
- All accounts receivable due;
- All notes or other loans due;
- All lawsuits, claims or causes of action by the Judgment Debtor against any other person, persons or companies;

- 1 ▪ All stocks, bonds or similar instruments owned by the employer;
- 2 ▪ All written or oral trusts of which the Judgment Debtor is a beneficiary;
- 3 ▪ All accounts of any kind in which any person is holding any item of value for
the Judgment Debtor for safekeeping or as custodian or trustee;
- 4 ▪ Evidence of any safe deposit boxes;
- 5 ▪ Leases in which the Judgment Debtor has the right to receive rent or anything
else of value; and
- 6 • Estates of which the Judgment Debtor is an heir, devisee or legatee.

8 4. Judgment Creditor shall utilize its best reasonable efforts to personally serve the
9 Judgment Debtor with a copy of this Order. Nonetheless, this Order shall be deemed served
10 upon the Judgment Debtor upon proof of attempted service at the last known address of the
11 Judgment Debtors, or upon proof that the Order was personally delivered to the office of
12 Judgment Debtor's attorney of record in this Case.

14 5. Should Judgment Debtors fail or refuse to cause a knowledgeable representative
15 to appear at the Judgment Debtor Examination herein scheduled, or to produce the documents
16 referred to above, this Court may adjudicate Judgment Debtor guilty of civil contempt of its
17 orders and may issue a warrant or seizure order to compel compliance with this Order.

19 DATED and DONE this 47th day of November 2013.

21 
22 _____
23 O.C.I. KU TCVG JUDGE

24 Submitted by:
25 CHRISTENSEN JAMES & MARTIN
26 By: /s/ Daryl E. Martin
27 Daryl E. Martin, Esq.